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Director
Federal Regulatory Issues

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

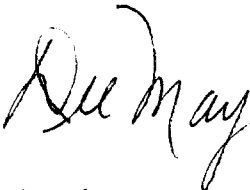
Re: In the Matter of Expanded Interconnection, CC Dockets 93-
162, 94-54, 95-185 and 91-141

Dear Mr. Caton:

Enclosed is a video developed and produced by NYNEX entitled "NYNEX Expanded Interconnection Through Collocation" as well as a written transcript of that video. Please enter this material into the record in the above-captioned proceedings.

Copies of the video may be purchased by the general public from ITS (the Commission's copy service) for a charge of \$25.00. To obtain a copy of the video, interested parties should call Wilbur Thomas of ITS at (202) 857-3800.

Sincerely,



Attachment

cc: Wilbur Thomas (ITS)

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NYNEX
Expanded Interconnection Video
Final Script
10/15/95

NYNEX
Expanded Interconnection
Through Collocation

Jamie Virga:

Hello. I'm Jamie Virga, Staff Director, Federal Regulatory Planning.

This is Downtown New York City, the financial capital of the US, and one of the largest telecommunications marketplaces in the world - linked to financial centers around the globe.

We'd like to show you how NYNEX is addressing the regulatory requirements for expanded interconnection - also known as collocation. We think the NYNEX way - including physical collocation - is the right way.

NYNEX's 140 West Street Central Office is just one of many NYNEX locations making expanded interconnection through physical collocation a reality. Here, we actually share physical space with several of our competitors. We want you to see that NYNEX takes interconnection seriously. And how NYNEX makes it easy.

We'll address key issues such as security, preparation of space, and engineering requirements. You'll see first hand how NYNEX is meeting - and exceeding - requirements for expanded interconnection.

We'll showcase the arrangements NYNEX is making for collocators at 140 West Street. However, to protect proprietary network information, we won't identify these customers.

First, you'll see where the actual network interface takes place. Then, you'll see *The Vault*, where the distribution cables - both fiber and copper - are located. Finally, you'll see a *Main Distribution Frame* and some of the physical equipment used to provide some of the interconnection services that are available.

Along the way, you'll meet some of the people who ensure that we provide a secure, easy access for our customers.

NYNEX, and this building in particular, has a strong history in this area.

Doyle Brown, Building Manager:

The location of 140 West Street is directly across the street from the Twin Towers. And the building was constructed 32 stories to be basically earthquake and bomb proof.

Bob Citro, Operations Manager:

NYNEX first provided virtual collocation back in 1989, and was the first to provide physical collocation back in 1991.

We've done collocation in such a manner that we've taken into account all the things that we've done within our network for over 100 years.

Security is a very serious issue in this arrangement, both for the collocator and for NYNEX. The collocation facility itself has a locking door which only the collocator has access to. And in general, collocation facilities are put in a separate area of the building that only the necessary collocators have access to.

In this particular building, the access door to the collocation area for example, has a card reader which we provide to the collocator so he can get access to the room.

Paul Martin, Security Manager:

In the past, it was easier for us to secure our facilities, because there were less people other than employees coming into our property at all times. But now that's changing, and now we have contractors. We have vendors. We have collocators. Collocators use contractors. So the security concerns have changed a little bit. But certainly they are equally as important as they always were. The managing director of corporate security for the corporation, Jim Trainor, he has made this collocation security project a very very high priority one in our department.

We recognize that, that they have needs which are 24 by 7 in nature. We recognize that they have needs to come in and service and work on their equipment on a regular basis. And they have to adhere to the same kinds of procedures and policies we have for any contractor or vendor when they come into the building. They have to sign in, once they've signed in, then they can go, where they're equipment is located. They have an access card to access their space. And then they work on their equipment, and then they would leave the building, and sign out of the building - just as anyone else would have to do.

Jamie Virga:

At the heart of the NYNEX approach is a single point of termination for all expanded interconnection services. We call this the *POT Bay*.

Bob Citro:

This is a great arrangement for collocators, from this one location they have access to a myriad of services provided by NYNEX. They can provide *DS3*, *DS1*, and *DSO Private Line* services. They can have access to *Switched Access* services, that provide

interconnection on a long distance basis. They have access to things like *Unbundled Loops* and *Unbundled Switch Ports* that are available on a local tariff. And this is one point at the *POT Bay* where he can interconnect to all those services within the building.

A collocation node like the one you see here is typical of what we provide. It's a ten by ten galvanized steel enclosure that's secure, and is supported by environmental controls and appropriate power quality as required for central office environment.

Sal Spagnola, Senior Engineer:

I originally designed the *POT Bay* and the arrangements of the *POT Bay* and how we actually interface at the *POT Bay*. My functions also include the accounting methods that we have in place for keeping track of collocation costs. Those costs are all kept in record. I also help to maintain and upgrade our databases.

This specific location here at West Street was at one point an employee lounge, so this had to be converted to central office type of environment, in that the air conditioning, lighting, had to be arranged so that it could accommodate various types of equipment.

The *POT Bay* is a physical meet from the collocater's cable to our cable which then accesses our facilities. We meet them at the *POT Bay* on one terminal strip. They terminate their cable on a second terminal strip, and then the collocater has the responsibility of meeting the terminal strips with a physical wire strap between the two terminal strips.

Maribeth Bailey, Project Leader, Network Interconnection Markets:

The interconnection team is a multi-disciplined team approach. Our objective is to work on methods and procedures for the unbundled network. And this is a real-time, evolving process. It's a partnership between our customers and NYNEX.

In addition to our traditional types of services like *Switched Access* or *Special Access* services, we have a variety of access to our network which would include an *Unbundled Port* service and an *Unbundled Link* service. This offers our customers choices in subscribing to the NYNEX network.

The customer base that we have at this time is very varied. It can be a *Interexchange Carrier*. It can be a CAP, which is a *Competitive Access Provider*. It could be a *Certified Local Exchange Carrier*, referred to as a CLEC. We also have government agency customers that have subscribed to the expanded interconnection arrangement.

Jamie Virga:

At this time, at least 40 NYNEX Central Offices are serving collocation customers with a total of more than 75 nodes.

Bob Citro:

The space provided to the interconnector is provided up to the same standard as NYNEX provides its own equipment. That is to say, it must be secure, it must have proper environmental controls, such as air conditioning and humidity to protect the equipment. And it also must be positioned strategically in the building to allow proper interconnection to the various services.

Jamie Virga:

What you're seeing now is the hallway leading to the area known as *The Vault*. It's the heart of the whole operation. Because this room houses the cable that keeps us all connected, an escort is needed. Only a handful of NYNEX employees have access to this key.

Pat Barnhart, Outside Plant Engineer:

As you can see around us there is lots of complexity within this room with all the different types of cables.

The cable comes in from the manhole system like the one behind me, and then it follows along the path and crosses up and goes into our alternate splice area. At that point, we transition to the fire rated cable which then follows the riser up to the collocation area to the customer's equipment.

The difference in the sizes of the cables that you see here are the copper cables versus the fiber. This particular cable is a 3600 pair copper cable. And the smaller ones are the fiber cable. Now all new installations in our cable vault will be fiber cable, and also that's a requirement that we have set forth for our collocators, that they only use fiber.

Depending on the technology associated around the end of these fibers, one of them could replace at least 50 of these copper cables.

We attempt to provide diversity to these customers by bringing their cables in from two different directions. In the event of disaster, we'll be able to divert their services from one entrance into another.

It's a very complex situation, and at West Street we're equipped to handle most any situation.

Mike Leide, Facilities Manager:

This is the ASA, which is the *Alternate Splicing Area* which allows the cable from the collocator to meet the central office fire retardant standards.

We're at the *Main Distributing Frame*, one of the four or five that are located at 140 West Street. This is where the collocator at his collocation node, can access the unbundled loop. This would give him access to anywhere from a 3 to 4 hundred thousand customer database from these particular MDF's.

Where we are now is the *T1 DSX* bay lineup, one of six that are located at the 140 West Street location. What this allows is the collocator from his POT Bay to access at a T1 digital level, any of his outside customers that he needs to serve out of the West Street CO.

Single point of termination allows our collocators even access into our leading edge technology services such as *Enterprise Services*.

Jamie Virga:

Mike Leide - and all of us at NYNEX - take our interconnection responsibilities seriously.

Bob Citro:

This kind of facility that we've designed allows the collocator to place his own equipment within the confines of the NYNEX central office, and gain good access to our various services and distribution facilities. It's efficient, it's secure, and it allows rapid provisioning.

Maribeth Bailey:

It takes a lot of creativity in coming up with developing systems and procedures that we can adapt to our existing rules and regulations.

Sal Spagnola:

The arrangement as we have here in NYNEX allows the collocator to maintain and own his own equipment within our central offices. He has access to that equipment.

I don't know of any other way that's better.

Jamie Virga:

We're confident our approach to expanded interconnection - including physical collocation - is the best way for everyone. But we're always working to improve and refine our procedures.

For NYNEX, I'm Jamie Virga. Thank you for joining us.

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